

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LINDA BEDELL *et al.*,

Plaintiffs,

v.

GEORGE HECKLER *et al.*,

Defendants.

Civil Action No. 2:20-cv-03804-WB

PLAINTIFFS' MOTION FOR SEPARATE AND FINAL DEFAULT JUDGMENT

Pursuant to Fed. R. Civ. P. 55, Plaintiffs Linda Bedell, the Linda Bedell Individual Retirement Account, Landon Bedell, Keaton Bedell, and Inner Design, Inc. Profit Sharing Plan (collectively, "Plaintiffs") respectfully request that this Court enter separate and final default judgments against Defendants Topwater Investment Management, LLC ("Topwater") and Green Mountain Fund, LLC ("Green Mountain") (together, the "Defaulting Defendants"). In support of this motion, Plaintiffs state as follows:

1. On December 16, 2020, the clerk entered an order of default with respect to each of the Defaulting Defendants pursuant to Fed. R. Civ. P. 55(a).
2. The defaults were well-grounded for the reasons set forth in the affidavit of Daniel P. Lawn attached to Plaintiff's Request for Clerk's Entry of Default, dated December 15, 2020 [ECF 46].
3. Plaintiffs are entitled to separate and final default judgments against each of the Defaulting Defendants for all relief requested in the Amended Complaint, including but not limited to the sum certain of \$26,155,015.14, as set forth in the Stipulation of Judgment [ECF 33].
4. Plaintiffs are entitled to separate and final judgments for the sum certain of \$26,155,015.14, plus all applicable pre- and post-judgment interest.

WHEREFORE, Plaintiffs respectfully request that this Court enter default judgments as to each of the Defaulting Defendants for the amounts set forth in this motion.

Dated this 24th day of February, 2021.

/s/ Ira Neil Richards

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Dated: February 24, 2021